

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

WINSTON LAWRENCE,

Plaintiff,

- against -

SOL G. ATLAS REALTY CO., INC.,
PETER FIDOS, in his official and
individual capacities; and SANDRA
ATLAS BASS in her official and
individual capacities,

Defendants.

14 Civ. 3616 (DRH)(GRB)

DECLARATION OF
ANDREW S. GOODSTADT

I, ANDREW S. GOODSTADT, an attorney duly admitted to practice law before the Courts of the State of New York, and in the Eastern District of New York, hereby declare under penalty of perjury that the foregoing is true and correct in accordance with 28 U.S.C. §1746:

1. I am an attorney at Goodstadt Law Group, PLLC. My law firm represents Plaintiff Winston Lawrence in the above-referenced action.

2. I submit this Declaration in support of Plaintiff Winston Lawrence's Fed. R. Civ. P. 72(a) Objection to Magistrate Judge Brown's Report and Recommendation.

3. Attached to this Declaration as Exhibit “A” is a true and correct copy of Magistrate Judge Gary R. Brown’s Report & Recommendation, dated June 16, 2015.

4. Attached to this Declaration as Exhibit “B” is a true and correct copy of the Complaint filed by Mr. Lawrence in the above-referenced action.

5. Attached to this Declaration as Exhibit “C” is a true and correct copy of the Collective Bargaining Agreement (“CBA”) between Service Employees International Union,

Local 32BJ and Sol G. Atlas, Inc. for the term beginning June 21, 2006 and ending on June 20, 2010.

6. Attached to this Declaration as Exhibit "D" is a true and correct copy of a Stipulation of Agreement, dated December 20, 2010, which amended and extended the term of the CBA to June 20, 2014.

7. I declare under the penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Dated: June 30, 2015
Carle Place, New York



Andrew S. Goodstadt